

SEALED

JUL 26 2019

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

CLERK, U.S. DISTRICT COURT

By United States of America  
Deputy

Jeffrey Jacoby Jordan

Case No.

**3-19MJ661-BH**

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 24, 2019 in the county of Dallas in the  
Northern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 USC 841(b)(1)(D)  
18 USC 924(c)(1)(A)(i)

possession with intent to distribute less than 50 kilograms of marijuana and  
possession of a firearm in furtherance of a drug trafficking crime.

This criminal complaint is based on these facts:

See attached affidavit of ATF Special Agent Tonya English

☒ Continued on the attached sheet.

J. English #4926

Complainant's signature

Tonya English, Special Agent, ATF

Printed name and title

Sworn to before me and signed in my presence.

Date: 7/26/19

Irma C. Ramirez

Judge's signature

City and state: Dallas, TX

IRMA C. RAMIREZ U.S. Magistrate Judge

Printed name and title

**Affidavit in Support of Criminal Complaint**

1. I, Tonya A. English, a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), being duly sworn, depose and state as follows:

2. I have been employed with the ATF since August of 2007. I have attended formal training at the ATF National Academy about firearm and narcotics related investigations to include but not limited to, the issuance and execution of search warrants, utilization of cooperating individuals, firearms identification, firearms trafficking, narcotics trafficking, and a variety of means to launder illegal proceeds. Prior to being employed with ATF, I was a police officer with the Arlington Police Department in Arlington, Texas, for over eight years.

3. This affidavit is made for the limited purposes of establishing probable cause that **Jeffrey Jacoby Jordan** has committed an offense in violation of 21 U.S.C. § 841(b)(1)(D), that is Possession with Intent to Distribute Less Than 50 Kilograms of Marihuana, and an offense in violation of 18 U.S.C. § 924(c)(1)(A)(i), that is Possession of a Firearm in Furtherance of a Drug Trafficking Crime.

4. The information contained in this affidavit is based on my personal knowledge and experience, my personal participation in this investigation, and information obtained from other law enforcement officers and/or agents involved in this investigation.

5. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to

believe that a violation of 21 U.S.C. § 841(b)(1)(D) and 18 U.S.C. § 924(c)(1)(A)(i) have been committed by **Jeffrey Jacoby Jordan**.

### **FACTS AND CIRCUMSTANCES**

6. On or about July 24, 2019, at approximately 1624 hours, Texas Department of Public Safety (DPS) Troopers C. Vicuna and P. Orejuela initiated a traffic stop on a blue 2010 Dodge Challenger displaying Texas License Plate (TX LP) LNG-2851 for a traffic violation while traveling northbound on Martin Luther King Jr. Boulevard near Colonial Avenue, Dallas, Dallas County, Texas, which is in the Dallas Division of the Northern District of Texas. The driver of the vehicle, later identified as **Jeffrey Jacoby Jordan**, turned left onto Colonial Avenue before coming to a stop. While behind the vehicle, DPS Troopers Vicuna and Orejuela observed **Jordan** making furtive movements and reaching into the area of the center console and the back seat. Upon approaching the vehicle and contacting **Jordan**, DPS Troopers Vicuna and Orejuela smelled the odor of marihuana coming from inside the vehicle. DPS Troopers asked **Jordan** about the odor of marihuana and **Jordan** gestured to a black duffel bag on the back seat containing marihuana in plain view. DPS Troopers asked **Jordan** if there were any firearms in the vehicle and **Jordan** indicated there was a firearm in the vehicle. DPS Troopers conducted a probable cause search of **Jordan's** vehicle and located five vacuum sealed plastic bags and one plastic bag containing a green leafy substance that weighed approximately six pounds in the black duffel bag on the back seat. DPS Troopers also located a Glock model 43 9x19 caliber pistol bearing serial number BCMD194 loaded with a magazine containing twelve rounds of 9mm Luger caliber ammunition underneath the driver's seat, a camouflage handbag

containing a large amount of U.S. Currency, and several plastic zip lock baggies of different sizes in the right front passenger area. Based on Trooper Vicuna's training and experience, the green leafy substance was believed to be marihuana.

7. A vehicle registration check on TX LP LNG-2851 revealed **Jordan** was the registered owner of the blue 2010 Dodge Challenger.

8. **Jordan** was transported to the Dallas County Sheriff's Office Lew Sterrett Jail and charged with Unlawful Carrying Weapon and Possession of Marihuana More Than 5 Pounds But Less Than or Equal To 50 Pounds. While being processed at the jail, **Jordan** made the res gestae statements to DPS Troopers that **Jordan** only dealt marihuana and had the firearm for protection.

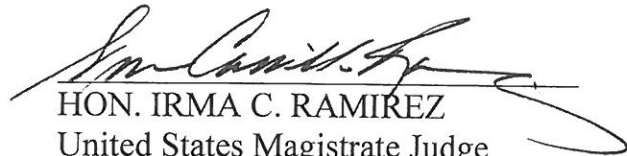
9. I am an Interstate Nexus Expert and have determined the frame of the Glock pistol possessed by **Jordan** was not manufactured in the State of Texas and has, by virtue of its presence in Texas, traveled in or affected interstate or foreign commerce.

10. I believe there is probable cause to believe that a violation of 21 U.S.C. § 841(b)(1)(D) and 18 U.S.C. § 924(c)(1)(A)(i) have been committed by **Jeffrey Jacoby Jordan** and request that a warrant issue for his arrest.

#4926

Tonya A. English  
Special Agent  
Bureau of ATF

Subscribed and sworn to before me this 26<sup>th</sup> day of July, 2019.

  
HON. IRMA C. RAMIREZ  
United States Magistrate Judge  
Northern District of Texas